MARICOPA COUNTY AIR QUALITY DIVISION

COMPANY: WINCUP

FACILITY: WINCUP

PERMIT: V97012

SUMMARY

The Title V operating permit is issued to WinCup, the Permittee, for the operation of the polystyrene (EPS) cup and food containers manufacturing facility. Operations at the facility fall under the Standard Industrial Classification (SIC) Code 3086, and Source Classification Codes 30800801, 30800802, and 30800803.

WinCup operates 24 hours per day, 7 days per week. Due to maintenance shutdowns and holidays, the facility operates approximately 360 days per year. The following is an overview of specific processes in WinCup's production process:

Receiving: The EPS beads arrive into the plant in lined corrugated boxes (i.e., gaylords) from an outside supplier. The beads have been impregnated with the blowing agent, pentane. The level of pentane in the beads is approximately 6.1% by weight. The gaylords are stored within the facility until the beads are introduced into the manufacturing process.

Mixing: EPS beads are pneumatically conveyed from the gaylord to the mixer where the beads are mixed with zinc stearate to enhance the flow characteristics of the material in subsequent steps. Zinc stearate is a solid, non-volatile powder that is stored onsite in 50-pound bags. Pentane emitted during mixing is captured and vented to the boilers where the pentane is thermally oxidized.

Pre-Expansion: From the mixers, EPS beads are pneumatically delivered to the pre-expander where they are augured into the pre-expander at a set rate. The pre-expanders apply steam heat to the EPS beads. This process causes the pentane within the EPS beads to act as a blowing agent, causing the EPS beads to expand to approximately 10 times their original diameter. Pentane emitted during pre-expansion is captured and vented to the boilers where the pentane is thermally oxidized.

Screening:

From the pre-expander the expanded beads (i.e., prepuff) are pneumatically transferred to screeners, which sort beads according to size. Oversized beads are broken up by an impeller and re-screened. Pentane emitted during the screening process is not captured by a control device.

Aging:

From the screener the prepuff is pneumatically conveyed to mesh storage bags for several hours to allow for bead stabilization by diffusing air into the expanded bead. Pentane emitted during the aging process is not captured by a control device.

Molding:

Aged prepuff is pneumatically conveyed to the molding machines where steam heat and pressure forms the prepuff into the desired shape (i.e., cups or other containers). The finished product is ejected from the molders and conveyed either to a printer or packaging stations. Pentane emitted during molding is not captured by a control device.

Printing:

The cups are pneumatically transferred to the stacking and printing area. Cups that are to be printed are sent to the in-line printers where letters and symbols are printed on the individual cups according to client needs. The cups that are not to be printed are counted and boxed off. The dry offset printing presses uses ultra violet curable blue, black, red, and yellow inks. The inks contain approximately 0.5% VOC by weight. Only small quantities of VOC are emitted from this process.

Final Product Storage:

Cups and containers that have been packed in polyethylene sleeves and placed in corrugated boxes are sent to the warehouse for storage until shipment offsite. Pentane emitted during warehouse storage is not captured by a control device.

Pursuant to Maricopa County Air Pollution Control Regulations, WinCup is classified as a major source of volatile organic compounds (VOC) due to the potential to emit VOC of greater than 100 tons per year and is subject to the Title V permitting procedures.

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Permit Conditions
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In accordance with Maricopa County Air Pollution Control Rules and Regulations (Rules), Rule 210 § 302.2, all Conditions of this Permit are federally enforceable unless they are identified as being locally enforceable only. However, any Permit Condition identified as locally enforceable only will become federally enforceable if, during the term of this Permit, the underlying requirement becomes a requirement of the Clean Air Act (CAA) or any of the CAA's applicable requirements.
All federally enforceable terms and conditions of this Permit are enforceable by the Administrator of the United States Environmental Protection Agency (Administrator or Administrator of the USEPA hereafter) and citizens under Section 304 of the CAA.
Any cited regulatory paragraphs or section numbers refer to the version of the regulation that was in effect on the first date of public notice of the applicable Permit Condition unless specified otherwise.

GENERAL CONDITIONS:

1. AIR POLLUTION PROHIBITED: [County Rule 100 §301] [SIP Rule 3]
The Permittee shall not discharge from any source whatever into the atmosphere regulated air pollutants which exceed in quantity or concentration that specified and allowed in the County or State Implementation Plan (SIP) Rules, the Arizona Administrative Code (AAC) or the Arizona Revised Statutes (ARS), or which cause damage to property or unreasonably interfere with the comfortable enjoyment of life or property of a substantial part of a community, or obscure visibility, or which in any way degrade the quality of the ambient air below the standards established by the Maricopa County Board of Supervisors or the Director of the Arizona Department of Environmental Quality (ADEQ).

2. CIRCUMVENTION: [County Rule 100 §104] [40 CFR 60.12] [40 CFR 63.4(b)]
The Permittee shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of regulated air pollutants to the atmosphere, conceals or dilutes an emission which would otherwise constitute a violation of this Permit or any Rule or any emission limitation or standard. The Permittee shall not circumvent the requirements concerning dilution of regulated air pollutants by using more emission openings than is considered normal practice by the industry or activity in question.

3. CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS:
[County Rule 100 §401] [County Rule 210 §§301.7, 302.1e (1), 305.1c (1) & 305.1e]
Any application form, report, or compliance certification submitted under the County Rules or these Permit Conditions shall contain certification by a responsible official of truth, accuracy, and completeness of the application form or report as of the time of submittal. This certification and any other certification required under the County Rules or these Permit Conditions shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

4. COMPLIANCE:
A. COMPLIANCE REQUIRED:
1) The Permittee must comply with all conditions of this permit and with all applicable requirements of Arizona air quality statutes and the air quality rules. Compliance with permit terms and conditions does not relieve, modify, or otherwise affect the Permittee's

duty to comply with all applicable requirements of Arizona air quality statutes and the Maricopa County Air Pollution Control Regulations. Any permit non-compliance is grounds for enforcement action; for a permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. Noncompliance with any federally enforceable requirement in this Permit constitutes a violation of the Act. [This Condition is federally enforceable if the condition or requirement itself is federally enforceable and only locally enforceable if the condition or requirement itself is locally enforceable only]

[County Rule 210 §§301.8b (4) & 302.1h (1)]

2) The Permittee shall halt or reduce the permitted activity in order to maintain compliance with applicable requirements of Federal laws, Arizona laws, the County Rules, or other conditions of this Permit.

[County Rule 210 §302.1h (2)]

3) For any major source operating in a nonattainment area for any pollutant(s) for which the source is classified as a major source, the source shall comply with reasonably available control technology (RACT) as defined in County Rule 100.

[County Rule 210 §302.1(h)(6)] [SIP Rule 220 §302.1]

Compliance with the RACT requirements of this Permit Condition for nitrogen oxides (NO_x) shall not be required if a waiver granted by the Administrator under Section 182 (f) of the Clean Air Act is in effect.

4) For any major source operating in a nonattainment area designated as serious for PM_{10}, for which the source is classified as a major source for PM_{10}, the source shall comply with the best available control technology (BACT), as defined in County Rule 100.

[County Rule 210 §302.1(h)(7)]

B. COMPLIANCE CERTIFICATION REQUIREMENTS: [County Rule 210 §305.1d]

The Permittee shall file an annual compliance certification with the Control Officer and also with the Administrator of the USEPA. The report shall certify compliance with the terms and conditions contained in this Permit, including emission limitations, standards, or work practices.

The certification shall be on a form supplied or approved by the Control Officer and shall include each of the following:

1) The identification of each term or condition of the permit that is the basis of the certification;
2) The compliance status;
3) Whether compliance was continuous or intermittent;
4) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
5) Other facts as the Control Officer may require to determine the compliance status of the source.

The annual certification shall be filed at the same time as the second semiannual monitoring report required by the Specific Condition section of these Permit Conditions and every 12 months thereafter.

C. COMPLIANCE PLAN: [County Rule 210 §305.1g]

Based on the certified information contained in the application for this Permit, the facility is in compliance with all applicable requirements in effect as of the first date of public notice of the

proposed conditions for this Permit unless a compliance plan is included in the Specific Conditions section of this Permit. The Permittee shall continue to comply with all applicable requirements and shall meet any applicable requirements that may become effective during the term of this permit on a timely basis. [This Condition is federally enforceable if the applicable requirement itself is federally enforceable and only locally enforceable if the applicable requirement itself is locally enforceable only]

5. CONFIDENTIALITY CLAIMS:

Any records, reports or information obtained from the Permittee under the County Rules or this Permit shall be available to the public, unless the Permittee files a claim of confidentiality in accordance with ARS §49-487(C) which:

A. precisely identifies the information in the permit(s), records, or reports which is considered confidential, and

B. provides sufficient supporting information to allow the Control Officer to evaluate whether such information satisfies the requirements related to trade secrets or, if applicable, how the information, if disclosed, could cause substantial harm to the person's competitive position.
The claim of confidentiality is subject to the determination by the Control Officer as to whether the claim satisfies the claim for trade secrets.

[County Rule 200 §411]

A claim of confidentiality shall not excuse the Permittee from providing any and all information required or requested by the Control Officer and shall not be a defense for failure to provide such information.

[County Rule 100 §402]

If the Permittee submits information with an application under a claim of confidentiality under ARS §49-487 and County Rule 200, the Permittee shall submit a copy of such information directly to the Administrator of the USEPA.

[County Rule 210 §301.5]

6. CONTINGENT REQUIREMENTS:

NOTE: This Permit Condition covers activities and processes addressed by the CAA which may or may not be present at the facility. This condition is intended to meet the requirements of Section 504(a) of the 1990 Amendments to the CAA, which requires that Title V permits contain conditions necessary to assure compliance with applicable requirements of the Act as well as the Acid Rain provisions required to be in all Title V permits.

A. ACID RAIN: [County Rule 210 §§302.1b (2) & 302.1f] [County Rule 371 §301]

1). Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the CAA and incorporated under County Rule 371, both provisions shall be incorporated into this Permit and shall be enforceable by the Administrator.

2) The Permittee shall not allow emissions exceeding any allowances that the source lawfully holds under Title IV of the CAA or the regulations promulgated hereunder and incorporated under County Rule 371.

a) No permit revision shall be required for increases in emissions that are authorized by allowances acquired under the acid rain program and incorporated under County Rule 371, provided that such increases do not require a permit revision under any other applicable requirement.

b) No limit is placed on the number of allowances held by the Permittee. The Permittee may not, however, use allowances as a defense to non-compliance with any other applicable requirement.

c) Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the CAA.

d) All of the following prohibitions apply to any unit subject to the provisions of Title IV of the CAA and incorporated into this Permit under County Rule 371:

(1) Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners or operators of the unit or the designated representative of the owners or operators.

(2) Exceedances of applicable emission rates.

(3) The use of any allowance prior to the year for which it was allocated.

(4) Violation of any other provision of the permit.

B. ASBESTOS: [40 CFR 61, Subpart M] [County Rule 370 §301.8 - locally enforceable only]
The Permittee shall comply with the applicable requirements of Sections 61.145 through 61.147 and 61.150 of the National Emission Standard for Asbestos and County Rule 370 for all demolition and renovation projects.

C. RISK MANAGEMENT PLAN (RMP): [40 CFR 68]
Should this stationary source, as defined in 40 CFR 68.3, be subject to the accidental release prevention regulations in 40 CFR Part 68, then the Permittee shall submit an RMP by the date specified in 40 CFR Section 68.10 and shall certify compliance with the requirements of 40 CFR Part 68 as part of the annual compliance certification as required by 40 CFR Part 70. However, neither the RMP nor modifications to the RMP shall be considered to be a part of this Permit.

D. STRATOSPHERIC OZONE PROTECTION: [40 CFR 82 Subparts E, F, and G]
If applicable, the Permittee shall follow the requirements of 40 CFR 82.106 through 82.124 with respect to the labeling of products using ozone depleting substances.

If applicable, the Permittee shall comply with all of the following requirements with respect to recycling and emissions reductions:

1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices under 40 CFR 82.156.

2) Equipment used during maintenance, service, repair, or disposal of appliances must meet the standards for recycling and recovery equipment in accordance with 40 CFR 82.158.

3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by a certified technician under 40 CFR 82.161.

If applicable, the Permittee shall follow the requirements of 40CFR 82 Subpart G, including all Appendices, with respect to the safe alternatives policy on the acceptability of substitutes for ozone-depleting compounds.

7. DUTY TO SUPPLEMENT OR CORRECT APPLICATION: [County Rule 210 §301.6]
If the Permittee fails to submit any relevant facts or has submitted incorrect information in a permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, the Permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a proposed permit.

8. EMERGENCY EPISODES: [County Rule 600 §302] [SIP Rule 600 §302]

If an air pollution alert, warning, or emergency has been declared, the Permittee shall comply with any applicable requirements of County Rule 600 §302.

9. EMERGENCY PROVISIONS: [County Rule 130 §§201 & 402]

An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation, and that cause the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

An emergency constitutes an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the requirements of this Permit Condition are met.

The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

A. An emergency occurred and that the Permittee can identify the cause or causes of the emergency;
B. At the time of the emergency, the permitted source was being properly operated;
C. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in this permit; and
D. The Permittee as soon as possible telephoned the Control Officer, giving notice of the emergency, and submitted notice of the emergency to the Control Officer by certified mail, facsimile, or hand delivery within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice fulfills the requirement of County Rule 210 §302.1.e (2) with respect to deviation reporting. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

This provision is in addition to any emergency or upset provision contained in any applicable requirement.

10. EXCESS EMISSIONS: [County Rule 140 §§103, 401 & 402]

NOTE: There are reporting requirements associated with excess emissions. These requirements are contained in the Reporting section of the General Permit Conditions in a subparagraph called Excess Emissions. The definition of excess emissions can be found in County Rule 100 §200.

A. Exemptions: The excess emissions provisions of this Permit Condition do not apply to the following standards and limitations:

1) Promulgated pursuant to Section 111 (Standards Of Performance for New Stationary Sources) of the Clean Air Act (Act) or Section 112 (National Emission Standards For Hazardous Air Pollutants) of the Act;
2) Promulgated pursuant to Title IV (Acid Deposition Control) of the Act or the regulations promulgated hereunder and incorporated under Rule 371 (Acid Rain) of these rules or Title VI (Stratospheric Ozone Protection) of the Act;
3) Contained in any Prevention Of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the Environmental Protection Agency (EPA);

4) Included in a permit to meet the requirements of Rule 240 (Permit Requirements For New Major Sources And Major Modifications To Existing Major Sources), Subsection 308.1(e) (Permit Requirements For Sources Located In Attainment And Unclassified Areas) of these rules.

B. Affirmative Defense For Malfunctions: Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. The owner and/or operator of a source with emissions in excess of an applicable emission limitation due to malfunction has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner and/or operator of the source has complied with the excess emissions reporting requirements of these Permit Conditions and has demonstrated all of the following:

1) The excess emissions resulted from a sudden and unavoidable breakdown of the process equipment or the air pollution control equipment beyond the reasonable control of the operator;
2) The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
3) If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, then the owner and/or operator satisfactorily demonstrated that such measures were impractical;
4) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
5) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
6) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
7) During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in County Rule 510 that could be attributed to the emitting source;
8) The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;
9) All emissions monitoring systems were kept in operation, if at all practicable; and
10) The owner's and/or operator's actions in response to the excess emissions were documented by contemporaneous records.

C. Affirmative Defense For Startup And Shutdown:

1) Except as provided in paragraph 2) below, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. The owner and/or operator of a source with emissions in excess of an applicable emission limitation due to startup and shutdown has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner and/or operator of the source has complied with the excess emissions reporting requirements of these Permit Conditions and has demonstrated all of the following:
    a. The excess emissions could not have been prevented through careful and prudent planning and design;

b. If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;
c. The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable, during periods of such emissions;
e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
f. During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in County Rule 510 (Air Quality Standards) that could be attributed to the emitting source;
g. All emissions monitoring systems were kept in operation, if at all practicable; and
h. The owner's and/or operator's actions in response to the excess emissions were documented by contemporaneous records.

2) If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to paragraph A. of this Permit Condition.

D. Affirmative Defense For Malfunctions During Scheduled Maintenance: If excess emissions occur due to malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to paragraph B. of this Permit Condition.

E. Demonstration Of Reasonable And Practicable Measures: For an affirmative defense under paragraphs A and B of this Permit Condition, the owner and/or operator of the source shall demonstrate, through submission of the data and information required by this Permit Condition and the excess emissions reporting requirements of these Permit Conditions, that all reasonable and practicable measures within the owner's and/or operator's control were implemented to prevent the occurrence of the excess emissions.

11. FEES: [County Rule 200 §409] [County Rule 210 §§302.1i & 401]
The Permittee shall pay fees to the Control Officer under ARS 49-480(D) and County Rule 280.

12. MODELING: [County Rule 200 §407] [Locally enforceable only]
Where the Control Officer requires the Permittee to perform air quality impact modeling, the Permittee shall perform the modeling in a manner consistent with the "Guideline on Air Quality Models (Revised)" (EPA-450/2-78-027R, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, N.C. 27711, July 1986) and "Supplement B to the Guideline on Air Quality Models" (U.S. Environmental Protection Agency, September 1990). Both documents shall be referred to hereinafter as "Guideline", and are adopted by reference. Where the person can demonstrate that an air quality impact model specified in the guideline is inappropriate, the model may be modified or another model substituted if found to be acceptable to the Control Officer.

13. MONITORING / TESTING:
A. The Permittee shall monitor, sample, or perform other studies to quantify emissions of regulated air pollutants or levels of air pollution that may reasonably be attributable to the

facility if required to do so by the Control Officer, either by Permit or by order in accordance with County Rule 200 §309.

[County Rule 200 §309] [SIP Rule 41]

B. Except as otherwise specified in these Permit Conditions or by the Control Officer, the Permittee shall conduct required testing used to determine compliance with standards or permit conditions established under the County or SIP Rules or these Permit Conditions in accordance with County Rule 270 and the applicable testing procedures contained in the applicable Rule, the Arizona Testing Manual for Air Pollutant Emissions or other approved USEPA test methods.

[County Rule 200 §408] [County Rule 210 §302.1.c] [County Rule 270 §§300 & 400] [SIP Rule 27]

C. The owner or operator of a permitted source shall provide, or cause to be provided, performance testing facilities as follows:

1) Sampling ports adequate for test methods applicable to such source.
2) Safe sampling platform(s).
3) Safe access to sampling platforms(s).
4) Utilities for sampling and testing equipment.

[County Rule 270 §405] [SIP Rule 42]

14. PERMITS:

A. BASIC: [County Rule 210 §302.1h (3)]

This Permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.

B. DUST CONTROL PLAN REQUIREMENTS:

(NOTE: If the Permittee engages in or allows any routine dust generating activities at the facility, the Permittee shall apply to have the routine dust generating activity covered as part of this Permit. Nonroutine activities, such as construction, require a separate Earthmoving Permit that must be obtained from the Control Officer before the activity may begin.) [County Rule 310 §303.3] [SIP Rule 301 §303.3]

1) The Permittee must first submit a Dust Control Plan and obtain the Control Officer's approval of the Dust Control Plan before commencing any routine dust generating operation.

[County Rule 310 §303.3] [SIP Rule 310 §303.3]

2) A Dust Control Plan shall not be required to play on a ball field and/or for landscape maintenance. For the purpose of this Permit Condition, landscape maintenance does not include grading, trenching, nor any other mechanized surface disturbing activities.

[County Rule 310 §303.4] [SIP Rule 310 §303.4]

3) Any Dust Control Plan shall, at a minimum, contain all the information described in Section 304 of Rule 310.

[County Rule 310 §303.1] [SIP Rule 310 §303.1]

4) Regardless of whether an approved Dust Control Plan is in place or not, the Permittee is still subject to all requirements of Rule 310 at all times.

[County Rule 310 §303] [SIP Rule 310 §303]

C. PERMITS AND PERMIT CHANGES, AMENDMENTS AND REVISIONS:

1) The Permittee shall comply with the Administrative Requirements of Section 400 of County Rule 210 for all changes, amendments and revisions at the facility for any source subject to regulation under County Rule 200, shall comply with all required time frames, and shall obtain any required preapproval from the Control Officer before making changes. All applications shall be filed in the manner and form prescribed by the Control Officer. The application shall contain all the information necessary to enable the Control Officer to make the determination to grant or to deny a permit or permit revision including information listed in County Rule 200 §308 and County Rule 210 §§301 & 302.3.

[County Rule 200 §§301 & 308] [County Rule 210 §§301.4a, b, c, & 400]

2) The Permittee shall supply a complete copy of each application for a permit, a minor permit revision, or a significant permit revision directly to the Administrator of the USEPA. The Control Officer may require the application information to be submitted in a computer-readable format compatible with the Administrator's national database management system.

[County Rule 210 §§303.1a, 303.2, & 406.4]

3) While processing an application, the Control Officer may require the applicant to provide additional information and may set a reasonable deadline for a response.

[County Rule 210 §301.4f]

4) No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

[County Rule 210 §302.1j]

D. POSTING:

1) The Permittee shall keep a complete permit clearly visible and accessible on the site where the equipment is installed.

[County Rule 200 §311]

2) If a Dust Control Plan, as required by Rule 310, has been approved by the Control Officer, the Permittee shall post a copy of the approved Dust Control Plan in a conspicuous location at the work site, within on-site equipment, or in an on-site vehicle, or shall otherwise keep a copy of the Dust Control Plan available on site at all times.

[County Rule 310 §401] [SIP Rule 310 §401]

E. PROHIBITION ON PERMIT MODIFICATION: [County Rule 200 §310]

The Permittee shall not willfully deface, alter, forge, counterfeit, or falsify this permit.

F. RENEWAL:

1) The Permittee shall submit an application for the renewal of this Permit in a timely and complete manner. For purposes of permit renewal, a timely application is one that is submitted at least six months, but not more than 18 months, prior to the date of permit

expiration. A complete application shall contain all of the information required by the County Rules including Rule 200 §308 and Rule 210 §§301 & 302.3.

[County Rule 210 §§301.2a, 301.4a, b, c, d, h & 302.3]

2) The Permittee shall file all permit applications in the manner and form prescribed by the Control Officer. To apply for a permit renewal, the Permittee shall complete the "Standard Permit Application Form" and shall supply all information, including the information required by the "Filing Instructions" as shown in Appendix B of the County Rules, which is necessary to enable the Control Officer to make the determination to grant or to deny a permit which shall contain such terms and conditions as the Control Officer deems necessary to assure a source's compliance with the requirements of the CAA, ARS and County Rules.

[County Rule 200 §§308 & 309] [County Rule 210 §301.1]

3) The Control Officer may require the Permittee to provide additional information and may set a reasonable deadline for a response.

[County Rule 210 §301.4f]

4) If the Permittee submits a timely and complete application for a permit renewal, but the Control Officer has failed to issue or deny the renewal permit before the end of the term of the previous permit, then the permit shall not expire until the renewal permit has been issued or denied. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit, by the deadline specified by the Control Officer, any additional information identified as being needed to process the application.

[County Rule 200 §403.2] [County Rule 210 §§301.4f & 301.9]

G. REVISION / REOPENING / REVOCATION:

1) This permit shall be reopened and revised to incorporate additional applicable requirements adopted by the Administrator pursuant to the CAA that become applicable to the facility if this permit has a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this Permit is due to expire unless the original permit or any of its terms have been extended pursuant to Rule 200 §403.2.

[County Rule 200 §402.1a (1)]

Any permit revision required under this Permit Condition, 14.G.1, shall reopen the entire permit and shall comply with provisions in County Rule 200 for permit renewal *(Note: this includes a facility wide application and public comment on the entire permit)* and shall reset the five year permit term.

[County Rule 210 §302.5]

2) This permit shall be reopened and revised under any of the following circumstances:
   a) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Title V permit.
   b) The Control Officer or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

c) The Control Officer or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue a permit under this Permit Condition, 14.G.2, shall follow the same procedures as apply to initial permit issuance and shall effect only those parts of the Permit for which cause to reopen exists.

[County Rule 200 §402.1]

3) This permit shall be reopened by the Control Officer and any permit shield revised, when it is determined that standards or conditions in the permit are based on incorrect information provided by the applicant.

[County Rule 210 §407.3]

4) This Permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Permit revision, revocation and reissuance, or termination or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.

[County Rule 210 §302.1h (3)]

H. REVISION UNDER A FEDERAL HAZARDOUS AIR POLLUTANT STANDARD:

[County Rule 210 §301.2c] [locally enforceable only]

If the Permittee becomes subject to a standard promulgated by the Administrator under Section 112(d) of the CAA, the Permittee shall, within 12 months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard.

I. REQUIREMENTS FOR A PERMIT:

1) Air Quality Permit: Except as noted under the provisions in Sections 403 and 405 of County Rule 210, no source may operate after the time that it is required to submit a timely and complete application, except in compliance with a permit issued under County Rule 210. Permit expiration terminates the Permittee's right to operate. However, if a source submits a timely and complete application, as defined in County Rule 210 §301, for permit issuance, revision, or renewal, the source's failure to have a permit is not a violation of the County Rules until the Control Officer takes final action on the application. The Source's ability to operate without a permit as set forth in this paragraph shall be in effect from the date the application is determined to be complete until the final permit is issued. This protection shall cease to apply if, subsequent to the completeness determination, the applicant fails to submit, by the deadline specified in writing by the Control Officer, any additional information identified as being needed to process the application. If a source submits a timely and complete application for a permit renewal, but the Control Officer has failed to issue or deny the renewal permit before the end of the term of the previous permit, then the permit shall not expire until the permit renewal has been issued or denied.

[County Rule 210 §301.9]

2) Earthmoving Permit:
(NOTE: If the Permittee engages in or allows any routine dust generating activities at the facility, the Permittee shall apply to have the routine dust generating activity covered as part of this Permit. Non-routine activities, such as construction, require a

separate Earthmoving Permit that must be obtained from the Control Officer before the activity may begin.) *[County Rule 310 §303.3] [SIP Rule 301 §303.3]*

3) Burn Permit: The Permittee shall obtain a Permit To Burn from the Control Officer before conducting any open outdoor fire except for the activities listed in County Rule 314 §§302.1 and 302.2.

[County Rule 314] [County Rule 200 §306] [SIP Rule 314]

J. RIGHTS AND PRIVILEGES: [County Rule 210 §302.1h (4)]
This Permit does not convey any property rights nor exclusive privilege of any sort.

K. SEVERABILITY: [County Rule 210 §302.1g]
The provisions of this Permit are severable, and, if any provision of this Permit is held invalid, the remainder of this Permit shall not be affected thereby.

L. SCOPE:
The issuance of any permit or permit revision shall not relieve the Permittee from compliance with any Federal laws, Arizona laws, or the County or SIP Rules, nor does any other law, regulation or permit relieve the Permittee from obtaining a permit or permit revision required under the County Rules.

[County Rule 200 §308]

Nothing in this permit shall alter or affect the following:

1) The provisions of Section 303 of the Act (Emergency Orders), including the authority of the Administrator of the USEPA under that section.
2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.
3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act.
4) The ability of the Administrator of the USEPA or of the Control Officer to obtain information from the Permittee under Section 114 of the Act, or any provision of State law.
5) The authority of the Control Officer to require compliance with new applicable requirements adopted after the permit is issued. [Locally enforceable only]

[County Rule 210 §407.2]

M. TERM OF PERMIT: [County Rule 210 §§302.1a & 402]
This Permit shall remain in effect for no more than 5 years from the date of issuance.

N. TRANSFER: [County Rule 200 §404]
Except as provided in ARS §49-429 and County Rule 200, this permit may be transferred to another person if the Permittee gives notice to the Control Officer in writing at least 30 days before the proposed transfer and complies with the permit transfer requirements of County Rule 200 and the administrative permit amendment procedures under County Rule 210.

15. RECORDKEEPING:

A. RECORDS REQUIRED: [County Rule 100 §501] [County Rule 310 §502] [SIP Rule 40 A]
The Permittee shall maintain records of all emissions testing and monitoring, records detailing all malfunctions which may cause any applicable emission limitation to be exceeded, records detailing the implementation of approved control plans and compliance schedules, records

required as a condition of any permit, records of materials used or produced, and any other records relating to the emission of air contaminants which may be requested by the Control Officer.

B. RETENTION OF RECORDS:
Unless a longer time frame is specified by these Permit Conditions, information and records required by applicable requirements and copies of summarizing reports recorded by the Permittee and submitted to the Control Officer shall be retained by the Permittee for 5 years after the date on which the information is recorded or the report is submitted
[County Rule 100 §504] [SIP Rule 40 C]

The Permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
[County Rule 210 §§302.1d(2)]

C. MONITORING RECORDS: [County Rule 210 §§302.1d(1) & 305.1b]
Records of any monitoring required by this Permit shall include the following:
1) The date, place as defined in the permit, and time of sampling or measurements;
2) The date(s) analyses were performed;
3) The name of the company or entity that performed the analysis;
4) The analytical techniques or methods used;
5) The results of such analysis; and
6) The operating conditions as existing at the time of sampling or measurement.

D. RIGHT OF INSPECTION OF RECORDS: [County Rule 100 §106] [SIP Rule 40 D]
When the Control Officer has reasonable cause to believe that the Permittee has violated or is in violation of any provision of County Rule 100 or any County Rule adopted under County Rule 100, or any requirement of this permit, the Control Officer may request, in writing, that the Permittee produce all existing books, records, and other documents evidencing tests, inspections, or studies which may reasonably relate to compliance or noncompliance with County Rules adopted under County Rule 100. No person shall fail nor refuse to produce all existing documents required in such written request by the Control Officer.

16. REPORTING:
NOTE: See the Permit Condition titled Certification Of Truth, Accuracy and Completeness in conjunction with reporting requirements.

A. ANNUAL EMISSION INVENTORY REPORT: [County Rule 100 §505] [SIP Rule 40 B]
Upon request of the Control Officer and as directed by the Control Officer, the Permittee shall complete and shall submit to the Control Officer an annual emissions inventory report. The report is due by April 30, or 90 days after the Control Officer makes the inventory form(s) available, whichever occurs later.

The annual emissions inventory report shall be in the format provided by the Control Officer.

The Control Officer may require submittal of supplemental emissions inventory information forms for air contaminants under ARS §49-476.01, ARS §49-480.03 and ARS §49-480.04.

B. DATA REPORTING: [County Rule 100 §502]

When requested by the Control Officer, the Permittee shall furnish to the Maricopa County Air Quality Division (Division hereafter) information to locate and classify air contaminant sources according to type, level, duration, frequency, and other characteristics of emissions and such other information as may be necessary. This information shall be sufficient to evaluate the effect on air quality and compliance with the County or SIP Rules. The Permittee may subsequently be required to submit annually, or at such intervals specified by the Control Officer, reports detailing any changes in the nature of the source since the previous report and the total annual quantities of materials used or air contaminants emitted.

C. DEVIATION REPORTING: [County Rule 210 §§302.1e & 305.1c]

The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions. Unless specified otherwise elsewhere in these Permit Conditions, an upset for the purposes of this Permit Condition shall be defined as the operation of any process, equipment or air pollution control device outside of either its normal design criteria or operating conditions specified in this Permit and which results in an exceedance of any applicable emission limitation or standard. The Permittee shall submit the report to the Control Officer by certified mail, facsimile, or hand delivery within 2 working days from knowledge of the deviation. The report shall contain a description of the probable cause of such deviations and any corrective actions or preventive measures taken. In addition, the Permittee shall report within a reasonable time of any long-term corrective actions or preventative actions taken as the result of any deviations from permit requirements.

All instances of deviations from the requirements of this Permit shall also be clearly identified in the semiannual monitoring reports required in the Specific Condition section of these Permit Conditions.

D. EMERGENCY REPORTING: [County Rule 130 §402.4]

(NOTE: Emergency Reporting is one of the special requirements which must be met by a Permittee wishing to claim an affirmative defense under the emergency provisions of County Rule 130. These provisions are listed earlier in these General Conditions in the section titled "Emergency Provisions". Since it is a form of deviation reporting, the filing of an emergency report also satisfies the requirement of County Rule 210 to file a deviation report.)

The Permittee shall, as soon as possible, telephone the Control Officer giving notice of the emergency, and submitted notice of the emergency to the Control Officer by certified mail, facsimile, or hand delivery within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

E. EMISSION STATEMENTS REQUIRED AS STATED IN THE ACT: [County Rule 100 §503]

Upon request of the Control Officer and as directed by the Control Officer, the Permittee shall provide the Control Officer with an emission statement, in such form as the Control Officer prescribes, showing measured actual emissions or estimated actual emissions of NO_x and volatile organic compounds (VOC) from that source. At a minimum, the emission statement shall contain all information contained in the "Guidance on Emission Statements" document as described in the USEPA's Aerometric Information Retrieval System (AIRS) Fixed Format Report (AFP 644). The statement shall contain emissions for the time period specified by the Control Officer. Statements shall be submitted annually.

F. EXCESS EMISSIONS REPORTING: [County Rule 140 §500] [Locally enforceable only]
(NOTE: This reporting subsection is associated with the requirements listed earlier in these General Conditions in the section titled "Excess Emissions".)

1) The owner and/or operator of any source shall report to the Control Officer any emissions in excess of the limits established by the County or SIP Rules or by these Permit Conditions. The report shall be in two parts as specified below:
   a) Notification by telephone or facsimile within 24 hours of the time when the owner and/or operator first learned of the occurrence of excess emissions that includes all available information from paragraph 2) of this Permit Condition.
   b) Detailed written notification by submission of an excess emissions report within 72 hours of the notification required by paragraph 1) a) of this Permit Condition.

2) The excess emissions report shall contain the following information:
   a) The identity of each stack or other emission point where the excess emissions occurred;
   b) The magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
   c) The time and duration or expected duration of the excess emissions;
   d) The identity of the equipment from which the excess emissions emanated;
   e) The nature and cause of such emissions;
   f) The steps taken, if the excess emissions were the result of a malfunction, to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions;
   g) The steps that were or are being taken to limit the excess emissions; and
   h) If this Permit contains procedures governing source operation during periods of startup or malfunction and the excess emissions resulted from startup or malfunction, a list of the steps taken to comply with the Permit procedures.

3) In the case of continuous or recurring excess emissions, the notification requirements of this Permit Condition shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in the notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period or changes in the nature of the emissions as originally reported shall require additional notification pursuant to paragraphs 1) and 2) of this Permit Condition.

G. OTHER REPORTING: [County Rule 210 §302.1h(5)]
The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing this permit, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by this Permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records directly to the Administrator of the USEPA along with a claim of confidentiality as covered elsewhere in these Permit Conditions.

17. RIGHT TO ENTRY AND INSPECTION OF PREMISES:
The Control Officer, during reasonable hours, for the purpose of enforcing and administering County Rules or any provision of ARS relating to the emission or control prescribed pursuant thereto, may enter every building, premises, or other place, except the interior of structures used as private

residences. Every person is guilty of a petty offense under ARS §49-488 who in any way denies, obstructs or hampers such entrance or inspection that is lawfully authorized by warrant.

[County Rule 100 §105] [SIP Rule 43]

The Permittee shall allow the Control Officer or his authorized representative, upon presentation of proper credentials and other documents as may be required by law, to:

A. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;
B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
C. Inspect, at reasonable times, any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
E. To record any inspection by use of written, electronic, magnetic, and photographic media.

[County Rule 210 §305.1f] [Locally enforceable only]

SPECIFIC CONDITIONS:

18. ALLOWABLE EMISSIONS LIMITATIONS

A. Facility-Wide

1) **Rolling 12 month VOC emission limit for bead processing, boiler, and solvent usage:** The Permittee shall limit emissions of VOC from bead bag opening through molding (referred to as "bead processing"), boilers, and solvent usage to no more than 95 tons per any rolling 12-month period. The permit must be reopened after performance testing is complete to revise the "bead processing" emission limit based on emission factors derived from performance testing.

[County Rule 210 §302.1b]
[County Rule 240 §305.3]

2) **Rolling 12 month VOC emission limit for final product storage:**
The Permittee shall limit emissions of VOC from final product storage to no more than 207 tons per any rolling 12-month period. The permit must be reopened after performance testing is completed to revise the final product storage emission limit based on the emission factors determined during testing.

[County Rule 210 §302.1b]

3) **Rolling 12 month throughput limit for Expanded Polystyrene (EPS) bead processing:**
VOC emission limit for bead processing, boiler, and solvent usage The Permittee shall process no more than 13,350,000 lbs EPS during any rolling 12-month period. The permit must be reopened after performance testing is complete to revise the production limit based on the determination of a new emission factor "F_1".

[County Rule 210 §302.1b]

4) The Permittee shall not use EPS raw beads with pentane content greater than 6.1% by weight.

[County Rule 210 §302.1b]

5) The Permittee shall not discharge into the ambient air from any single source of emissions any air contaminant, other than uncombined water, in excess of 20 percent opacity, except as provided in County Rule 300 §302.

[County Rule 300 §301]
[County Rule 323 §302]
[Locally enforceable only]

6) The opacity of any plume or effluent from any source of emissions, other than uncombined water, shall not be greater than 40 percent opacity as determined by Reference Method 9 in the Arizona Testing Manual.

[SIP Rule 30]

B. Gaseous and Odorous Air Contaminants

1) Sulfur Oxide:

The Permittee shall not emit into the ambient air any sulfur oxide in such a manner or amounts as to result in ground level concentrations at any place beyond the premises on which the source is located to exceed the limits specified below:

Concentration of Sulfur Dioxide	Averaging Time
850 $\mu g/m^3$	1 hour
250 $\mu g/m^3$	24 hours
120 $\mu g/m^3$	72 hours

[County SIP Rule 32§F]

C. Natural Gas Combustion – Boilers

1) The Permittee shall not discharge particulate matter into the atmosphere from either boiler in excess of 10.6 pounds per hour.

[SIP Rule 31 §H]
[SIP Rule 311 §304]

2) The Permittee shall limit NOx emissions from each boiler to no more than 155 ppmv at 3% O2, calculated as nitrogen dioxide, when burning gaseous fuel.

[County Rule 323 §304.1]
[Locally enforceable only]

19. OPERATIONAL LIMITATIONS AND STANDARDS

A. EPS Processing

1) The Permittee shall limit the sum of the VOC that escaped to atmosphere and the residual VOC in the resulting cups to 3.2 pounds for every 100 pounds of raw beads processed.

[County Rule 358 §303]

2) The Permittee shall not load EPS beads into the mixers or process EPS beads in the mixers or the pre-expanders, unless the exhaust from these pieces of equipment is ducted, in its entirety, to either of the Superior Aztec boilers.

[County Rule 210 §302.1]

3) The boilers must be operating in accordance with the most recently approved O&M plan.

[County Rule 210 §302.1]

4) The Permittee shall maintain a minimum operating temperature of 1,400ºF for each boiler during times when the exhaust from EPS processing is routed to the boiler(s).

[County Rule 210 §302.1]

5) The Permittee shall operate the Emission Control Device (ECS); i.e. boiler, such that 99% or more of the VOC entering the boiler is removed. Compliance with this permit condition will show compliance with County Rule 358 §305.1a and permit condition 19.A5.

[County Rule 220 §304.1]
[voluntary limit, locally enforceable only]

6) The Permittee shall ensure that the ECS (boiler) shall reduce the weight of VOC-as-carbon that enters the control device by at least 94%.

[County Rule 358 §305.1a]

7) The Permittee shall ensure that the ECS (boiler) maintains an hourly average outlet concentration of VOC below 20 milligrams per dry standard cubic meter. Expressed as a mass loading of VOC as milligrams of non-methane organic carbon.

[County Rule 358 §305.1b]

8) The Permittee shall equip the ECS with monitoring devices capable of demonstrating that the ECS is operating in a manner that assures compliance with Maricopa County Rule 358.

[County Rule 358 §305.2]

9) The Permittee shall install, calibrate, maintain and operate the monitoring device(s) in accordance with the manufacturers' instructions and the O&M Plan.

[County Rule 358 §305.2]

10) The monitoring device(s) shall provide the temperature, pressure, flow rate, or any other parameter used as an indicator to show proper ECS function.

[County Rule 358 §305.2]

11) The Permittee shall provide, implement, and maintain an O&M Plan for each for ECS required by this rule. The O&M Plan shall include the monitoring device(s) associated with the ECS. [County Rule 358 §306.1]

12) The Permittee shall submit to the Control Officer for approval the O&M plan of each ECS detailing associated monitoring devices.

[County Rule 358 §306.2]

13) The Permittee shall include in the O&M Plans the procedures for collecting and recording required data and other information in a form approved by the Control Officer, The data collected through the O&M Plan shall include key system operating parameters.

[County Rule 358 §306.2a]

14) The Permittee shall include in the O&M Plans the procedures and schedules for preventive and corrective maintenance performed for the purpose of maintaining the emission control system.

[County Rule 358 §306.2b]

15) The Permittee must comply with all O&M Plans that have been submitted for approval but which have not yet been approved, unless notified otherwise by the Control Officer in writing.

[County Rule 358 §306.3]

16) The following conditions apply to the VOC containment, identification, and disposal of VOC containing Material from EPS processing:

a) The Permittee shall store all fresh and used non-EPS VOC containing material in closed, leak- free containers when not in use.

[County Rule 358 §307.1a]

b) The Permittee shall store raw EPS beads in closed, leak-free, labeled containers when not in use.

[County Rule 358 §307.1b]

c) The Permittee may store VOC containing material in an enclosure ducted solely to an ECS that is approved by the Control Officer, in lieu of closed, leak free containers.

[County Rule 358 §307.2]

d) The Permittee must implement procedures to minimize spills of VOC-containing material as described in Maricopa County Rule 358 §307.1(a) , during their handling and transfer to or from containers, vats, enclosed systems, waste receptacles, and other equipment, whether the material is fresh, used, or waste.

[County Rule 358 §307.3]

e) The Permittee shall label containers used for initial, intermediate, or final storage of VOC containing materials addressed in Maricopa County Rule 358 §307.1 with their contents.

[County Rule 358 §307.4(a)]

f) The Permittee shall ensure that content-labeling is done according to the requirements of federal hazardous waste (RCRA) or occupational safety (OSHA) statutes and codes and meets the requirements in Maricopa County Rule 358 §307.4(a).

[County Rule 358 §307.4(b)]

17) The following conditions apply to the ductwork of the pentane recovery system:

a) The ductwork of the pentane recovery system shall be maintained under negative pressure. The minimum pressure drop must not fall below the minimum pressure drop as measured during the most recent performance test. The permit must be reopened to revise and incorporate the new operating pressure drop as determined during testing.

b) The Permittee shall use the data collected during the first performance test conducted pursuant to Condition 22.B, to calculate and record the average pressure drop. The minimum pressure drop measured during operation shall be no lower than the average minimum pressure drop measured during the performance test which the Permittee uses to establish the new emission factor F_1.

c) The Permittee shall submit a significant permit revision application within 90 days following submission of the performance test report, to include in the permit the minimum pressure drop (in. H_20) as determined by testing.

[County Rule 210 §302.1]

18) The following conditions apply to the pentane recovery system:

a) The volumetric flow rate of the pentane recovery system must not fall below the volumetric flow rate as measured using EPA Method 2 during the most recent performance test. The permit must be reopened to revise and incorporate the new volumetric flow rate as determined during testing.

[County Rule 210 §302.1]

b) The Permittee shall use the data collected during the first performance test, conducted pursuant to Condition 22.B, to calculate and record the minimum volumetric flow rate to the boilers. The minimum volumetric flow rate measured during operation shall be no lower than the minimum volumetric flow rate measured during the performance test which the Permittee uses to establish the new emissions factor F_1.

[County Rule 210 §302.1]

c) The Permittee shall submit a significant permit revision application within 90 days following submission of the performance test report, to include in the permit the minimum volumetric flow rate limit as determined above.

[County Rule 210 §302.1]

19) The pentane inlet concentration to the boiler shall not exceed 3750 parts per million by volume, which represents 25% of the lower explosive limit of pentane.

[County Rule 210 §302.1]

B. Gaseous and Odorous Air Contaminants

1) Gaseous and Odorous Emissions:
The Permittee shall not emit gaseous or odorous air contaminants from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution.

[County Rule 320 §300]
[County SIP Rule 32A]

2) Material Containment Required:
Materials including, but not limited to, solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizer and manure shall be processed, stored, used and transported in such a manner and by such means that they will not unreasonably evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices or equipment shall be mandatory.

[County Rule 320 §302]
[SIP Rule 32C]

C. Solvent Cleaning

1) Solvent Specifications
Except for Low-VOC Cleaners, as defined in Rule 331, all cleaning solvents used in non-boiling cleaning machines shall be conforming solvents. A conforming cleaning-solvent is a solvent which has a total VOC vapor pressure at 68ºF (20ºC) not exceeding 1 millimeter of mercury column.

[County Rule 331 §304.1]

[SIP Rule 331 §304.1]

2) Solvent Handling Requirements

a) All cleaning-solvent, including solvent soaked materials, shall be kept in closed leak-free containers that are opened only when adding or removing material. Rags used for wipe cleaning shall be stored in closed containers when not in use. Each container shall be clearly labeled with its contents.

b) If any cleaning-solvent escapes from a container the Permittee shall:
(1) Wipe up or otherwise remove immediately if in accessible areas.
(2) For areas where access in not feasible during normal production, remove as soon as reasonably possible.

c) Unless records show that VOC-containing cleaning material was sent offsite for legal disposal, it will be assumed that it evaporated on site.

[County Rule 331 §301]
[SIP Rule 331 §301]

3) Equipment Requirements for Cleaning Machines

a) The Permittee shall provide a leak-free container (degreaser) for the solvents and the articles being cleaned.

(1) The VOC-containment portion shall be impervious to VOC-containing liquid and vapors.

(2) No surface of any freeboard required by these permit conditions or Maricopa County Rule 331 or SIP Rule 331 shall have an opening or duct through which VOC can escape to the atmosphere except as required by OSHA.
[County Rule 331 §302.1]
[SIP Rule 331 §302.1]

b) The Permittee shall properly maintain and operate all cleaning machine equipment required by this permit and any of its emission controls required by this permit.
[County Rule 331 §302.2]
[SIP Rule 331 §302.2]

c) Cleaning Machine With Remote Reservoir: A batch cleaning machine with a remote reservoir, including cabinet type(s), shall be equipped with the following:

(1) A sink-like work area or basin which is sloped sufficiently towards the drain so as to prevent pooling of cleaning-solvent.

(2) A single, unimpeded drain opening or cluster of openings served by a single drain for the cleaning-solvent to flow from the sink into the enclosed reservoir. Such opening(s) shall be contained within a contiguous area not larger than 15.5 square inches (100 cm^2).

(3) Solvent Return: Provide a means for drainage of cleaned parts such that the drained solvent is returned to the cleaning machine.

[County Rule 331 §305.1]
[SIP Rule 331 §305.1]

d) Cleaning Machine With Internal Reservoir (i.e., without remote reservoir): Except for the use of Low-VOC Cleaners, the Permittee shall comply with all of the following requirements for cleaning machines with an internal reservoir:

(1) Have and use an internal drainage rack or other assembly that confines within the freeboard all cleaning-solvent dripping from parts and returns it to the hold of the cleaning machine (degreaser).

(2) Have an impervious cover which when closed prevents cleaning-solvent vapors in the cleaning machine from escaping into the air/atmosphere when not processing work in the cleaning machine. The cover shall be fitted so that in its closed position the cover is between the cleaning-solvent and any lip exhaust or other safety vent, except that such position of cover and venting may be altered by an operator for valid concerns of flammability established in writing and certified to by a Certified Safety Professional or a Certified Industrial Hygienist to meet health and safety requirements.

(3) The freeboard height shall be not less than 6 inches (15.2 cm). Freeboard height for batch cleaning machines is the vertical distance from the solvent/air interface to the least elevated point of the top-rim when the cover is open or removed, measured during idling mode.

(4) The freeboard zone shall have a permanent, conspicuous mark that locates the maximum allowable solvent level which conforms to the applicable freeboard requirements.

[County Rule 331 §305.2]
[SIP Rule 331 §305.2]
[SIP Rule 34 §C]

e) Cleaning Machine That Uses Cleaning Solvent That is Heated or Agitated: Except for the use of Low-VOC Cleaners, if a cleaning machine with an internal reservoir uses a cleaning solvent at a temperature above 120°F (49°C) or agitates the solvent, the Permittee shall comply with the following requirements, as applicable.

(1) Remote Reservoir Cleaning Machine: For a remote reservoir cleaning machine, the Permittee shall comply with the Equipment Requirements for leaning Machines With Remote Reservoir, as specified in this permit, and in addition, use a stopper in the drain or a cover covering the sink whenever the sink or cabinet is empty of solvent and nothing is being handled in the sink.

(2) Cleaning Machines With Internal Reservoir: For an internal reservoir cleaning machine, the Permittee shall comply with the Equipment Requirements for Cleaning Machines With Internal Reservoir and either of the following paragraphs:

(a) A Water Cover: A floating layer of water (insoluble in the solvent) at least 1 inch thick, and a freeboard at least 6 inches above the top of the solvent shall be present; or

(b) Freeboard and Cover: The basin shall have a freeboard ratio of 0.75 or greater and an impervious cover shall cover the basin whenever work is not being processed.

(3) Cabinet Style: Keep a cabinet-style cleaning machine closed at all times that it contains cleaning-solvent, except when introducing or removing work from the machine.

[County Rule 331 §305.3]
[SIP Rule 331 §305.3]
[SIP Rule 34 §B]

4) Operating & Signage Requirements For Cleaning Machines:

a) The Permittee shall conform to the following operating requirements when cleaning with cleaning-solvents other than Low-VOC Cleaners:

(1) Comfort fans shall not be used near cleaning machines, unless the cleaning machine is totally enclosed and cannot be penetrated by drafts;

(2) Any device designed to cover the solvent shall not be removed unless processing work in the cleaning machine or maintaining the machine;

(3) Drain cleaned parts for at least (15) fifteen seconds after cleaning or until dripping ceases, whichever is later;

(4) If using a cleaning-solvent spray system:

(a) Use only a continuous, undivided stream (not a fine, atomized, or shower type spray).

(b) Pressure at the orifice from which the solvent emerges shall not exceed (10) ten psig and shall not cause liquid solvent to splash outside the solvent container.

(c) In an in-line cleaning machine, a shower-type spray is allowed, provided that the spraying is conducted in a totally confined space that is separated from the environment.

(d) Exceptions to the foregoing subsections (a), (b), and (c) are provided for in these permit conditions under Special Non-vapor Cleaning Situations.

(5) The Permittee shall not cause agitation of a cleaning-solvent in a cleaning machine by sparging with air or other gas. Covers shall be placed over ultrasonic cleaners when the cleaning cycle exceeds (15) fifteen seconds;

(6) The Permittee shall not place porous or absorbent materials in or on a cleaning machine. This includes, but is not limited to, cloth, leather, wood, and rope. No object with a sealed wood handle, including a brush, is allowed;

(7) The ventilation rate at the cleaning machine shall not exceed 65 cfm per square foot of evaporative surface (20 $m^3/min/m^2$), unless that rate must be changed to meet a standard specified and certified by a Certified Safety Professional, a Certified Industrial Hygienist, or a licensed professional engineer experienced in ventilation, to meet health and safety requirements;

(8) Limit the vertical speed of mechanical hoists moving parts in and out of the cleaning machine to a maximum of 2.2 inches per second and (11) eleven ft/min (3.3 m/min);

(9) The Permittee shall prevent cross contamination of solvents regulated by these permit conditions under Solvent Specification (i.e., County Rule 331 §304) with solvents that are not so regulated. Use signs, separated work-areas, or other effective means for this purpose. This includes those spray gun cleaning solvents that are regulated by another rule.

[County Rule 331 §§ 303.1 and 308.4]
[SIP Rule 331 §§ 303.1 and 308.4]
[SIP Rule 34 §C.1]

b) When using cleaning-solvent, other than Low-VOC Cleaner, in any solvent cleaning machine (degreaser) or dip tank, the Permittee shall provide the following signage requirements on the machine, or within 3¼ feet (1 meter) of the machine, a permanent, conspicuous label, or placard which includes, at a minimum, each of the following applicable instructions, or its equivalent:

(1) "Keep cover closed when parts are not being handled." (This is not required for remote reservoir cleaners.)

(2) "Drain parts until they can be removed without dripping."

(3) "Do not blow off parts before they have stopped dripping."

(4) "Wipe up spills and drips as soon as possible; store used spill rags [or 'wiping material'] in covered container."

(5) "Don't leave cloth or any absorbent materials in or on this tank."

(6) For cleaning machines with moving parts such as hoists, pumps, or conveyors, post: "Operating instructions can be obtained from _____" where the Permittee shall list a person or place where the instructions are available.

[County Rule 331 §303.2]
[SIP Rule 331 §303.2]
[SIP Rule 34 §C.1]

5) Special Non-Vapor Cleaning Situations

a) When blasting or misting with conforming solvents, the Permittee shall operate and equip the cleaning machines as follows;

(1) The device shall have internal drainage, a reservoir or sump, and a completely enclosed cleaning chamber, designed so as to prevent any perceptible liquid from emerging from the device; and

(2) The device shall be operated such that there is no perceptible leakage from the device except for incidental drops from drained, removed parts.

[County Rule 331 §307.1]
[SIP Rule 331 §307.1]
[SIP Rule 34 §B]

b) Cleaning systems using conforming cleaning-solvent that emerges from an object undergoing flushing with a visible mist or at a pressure exceeding 10 psig, shall use a containment system that is designed to prevent any perceptible cleaning-solvent liquid from becoming airborne outside the containment system, such as a completely enclosed chamber.

[County Rule 331 §307.3]
[SIP Rule 331 §307.3
[SIP Rule 34 §B]

6) Partial Exemptions:

a) The provisions of these permit conditions that are based upon County Rule 331 §§ 302 through 307 do not apply to wipe cleaning.

b) The provisions of these permit conditions that are based upon County Rule 331 §§ 303 through 307 shall not apply to any non-vapor cleaning machine (degreaser) or dip-tank fitting either of the following descriptions, except that these cleaning machines shall be covered when work is not being processed:

(1) A small cleaner having a liquid surface area of 1 square foot (0.09 square meters) or less, or

(2) A small cleaner having a maximum capacity of one gallon (3.79 liters) or less.

[County Rule 331 §308.2]
[SIP Rule 331 §308.2

20. MONITORING AND RECORDKEEPING REQUIREMENTS

The Permittee shall retain the following records for a period of no less than 5 years from the date of such record. Records shall be kept onsite and made available to the Control Officer upon request.

A. Visible Emissions [County Rule 210 §302.1]

1) The Permittee shall log the following information for all visible emissions observations and Method 9 opacity readings required by this permit:

a) The date and time the visible emissions observation or Method 9 opacity reading was taken;

b) The name of the person who took the reading;
c) Whether or not visible emissions were present;
d) The opacity of visual emissions determined by a Method 9 opacity reading, if a Method 9 reading is required by these permit conditions;
e) If applicable, a description of any corrective action(s) taken, including the date of such action(s); and
f) Any other related information.

2) The Permittee shall conduct a weekly facility walk-through and observe visible emissions from any device capable of emitting any air contaminant other than uncombined water.

3) If visible emissions, other than uncombined water, are observed being discharged into the ambient air, the Permittee shall monitor for compliance with the opacity standards specified in the permit by having a certified visible emissions evaluator determine the opacity of the visible emissions being discharged into the ambient air using the techniques specified in EPA Reference Method 9.

If the Permittee has not received either a compliance status notification or notice of violation regarding opacity standard in the 12 months preceding the visual observation, the initial Method 9 opacity reading shall be taken within 3 days of the visual observance. If the Permittee has received either a compliance status notification or notice of violation regarding an opacity standard in the 12 months preceding the visual observation, the initial Method 9 opacity reading shall be taken within 1 day of the visual observance. If the emitting equipment is not operating on the day that the initial Method 9 opacity reading is required to be taken, then the initial Method 9 opacity reading shall be taken the next day that the emitting equipment is in operation. If the problem causing the visible emissions is corrected before the initial Method 9 opacity reading is required, and there are no visible emissions (excluding uncombined water) observed from the previously emitting equipment while the equipment is in normal operation, the Permittee shall not be required to conduct the Method 9 opacity readings.

Follow-up Method 9 opacity monitoring shall be performed by certified visible emissions evaluator in accordance with the following schedule:

a) Daily:

(1) Except as provided in the paragraph entitled “Cease Follow-up Method 9 Opacity Monitoring” of this Permit Condition, Method 9 opacity monitoring shall occur for each day that the emitting equipment is operating under normal conditions, until a minimum of 14 daily Method 9 monitoring events have occurred.

(2) If the Method 9 opacity reading required by this Permit Condition are less than 20% for 14 consecutive daily Method 9 readings, the frequency of Method 9 opacity readings may be decreased to weekly, in accordance with the paragraph entitled “Weekly” of this Permit Condition .monitoring events occur where the measured opacity does not exceed 20%, the frequency of Method 9 opacity monitoring may be changed to weekly, in accordance with paragraph 2 of this Permit Condition.

b) Weekly:

(1) If the Permittee has obtained 14 consecutive daily Method 9 readings which do not exceed 20% opacity, the frequency of Method 9 readings may be decreased t once per week for any week in which the emitting equipment is operated.

(2) If the opacity measured during a weekly Method 9 reading exceeds 20%, frequency of Method 9 opacity reading shall revert to daily, in accordance with paragraph entitled "Daily" of this Permit Condition.

(3) If the opacity measured during the required weekly Method 9 readings never exceeds 20%, the Permittee shall continue to obtain weekly opacity readings until the requirements of the paragraph entitled "Cease Follow-up Method 9 Opacity Monitioring" of this Permit Condition are met.

c) Cease Follow-up Method 9 Opacity Monitoring:
Regardless of the applicable monitoring schedule, follow-up Method 9 opacity reading may cease if the emitting equipment, while in standard mode of operation, have no visible emissions, other than uncombined water, during every observation taken during a Method 9 procedure. Method 9 opacity readings shall resume upon discovery of opacity emissions measured opacity of emissions from the emitting equipment, while the equipment is operating under normal conditions, is 0% for all the required readings taken during a Method 9 procedure.

4) Opacity Readings

a) Opacity shall be determined by observations of visible emissions conducted in accordance with 40 CFR Part 60, Appendix A, Method 9.

[40 CFR 60.11(b)]
[County Rule 300 §501]

b) Opacity of visible emissions from intermittent sources, as defined by County Rule 300 §201, shall be determined by observations conducted in accordance with 40 CFR Part 60 Appendix A, Method 9, except that at least 12 rather than 24 consecutive readings shall be required at 15-second intervals for the averaging time.

[County Rule 300 §502]
[Locally enforceable only]

B. EPS Processing

1) The Permittee shall keep records complete, up-to-date, and in a consistent and legible format.

[County Rule 358 §501.1]

2) The Permittee shall retain records for at least 5 years.

[County Rule 358 §502.1a]

3) The Permittee may submit records kept for other agencies or purposes to the Control Officer to meet the record requirements of Maricopa County Rule 358, provided such records contain the necessary information according to Section 502 of the rule.
[County Rule 358 §501.3]

4) The Permittee shall obtain and retain an original or copy of the VOC-content, as defined in Marciopa County Rule 358 §216, for each separate lot-number/identifier prior to expanding any part of a bead lot.
[County Rule 358 §502.1a]

5) The Permittee shall monitor and record the sum of the VOC that escapes to atmosphere and the residual VOC in the resulting cups at least once per operating shift for each product and bead type to meet the requirements of Maricopa County Rule 358.
[County Rule 358 §303]

6) The Permittee shall record the amount of EPS bead expanded, the cumulative total of EPS bead expanded in that month, and the corresponding lot numbers/indentifiers each day that the raw EPS material is expanded in a facility's expander.
[County Rule 358 §502.1b]

7) The Permittee shall maintain a current list of non-EPS materials, containing VOC used at the facility.
[County Rule 358 §502.2a]

8) The Permittee shall express VOC content on non-EPS material in one of the following three forms:

   (1) Pounds VOC per gallon (or grams VOC per liter), or
   (2) Fractional pounds of VOC per pound material (or grams per kilogram), or
   (3) The percent VOC by weight along with the specific gravity or density (two numbers are required for each entry).

[County Rule 358 §502.2b]

9) The Permittee shall record the amount and type of each non-EPS material, containing VOC that was used during each month, by the end of the following month.
[County Rule 358 §502.2c]

10) The Permittee shall on a daily basis record key system operating parameters (such as temperature, flow rate, pressure), as specified in most recent O&M plan and VOC concentration when using an ECS to comply with County Rule 358.
[County Rule 358 §502.3]

11) The Permittee shall maintain records of the rolling 12-month total weight of EPS beads processed. These records shall be updated on a monthly basis. If the rolling 12 month total weight of EPS beads processed reaches 1,080,000 lbs (80% of throughput limit), the Permittee shall update EPS processing records on a weekly basis. When weekly

recordkeeping is required, the Permittee shall record the amount of EPS that can be processed for the remainder of the month without exceeding the 13,350,000 lbs rolling 12-month throughput limit for EPS bead processing.

[County Rule 210 §301.1]

12) The Permittee shall maintain records of the rolling 12-month EPS processing VOC emissions. These records shall be updated on a monthly basis. If the rolling 12 month total of EPS processing VOC emissions (E_1) reaches 76 tons per year (80% of limit), the Permittee shall update EPS processing VOC emissions on a weekly basis and shall record the amount of EPS that can be processed for the remainder of the month without exceeding the 95 tons per year emission limit for EPS processing VOC emissions, boiler VOC emissions, and solvent usage emissions.

[County Rule 210 §301.1]

13) The Permittee shall maintain records of the rolling 12-month boiler VOC emissions. These records shall be updated on a monthly basis.

[County Rule 210 §301.1]

14) The Permittee shall maintain records of the rolling 12-month solvent usage VOC emissions. These records shall be updated on a monthly basis.

[County Rule 210 §301.1]

15) The Permittee shall maintain records of the rolling 12-month final product storage VOC emissions. These records shall be updated on a monthly basis. If the rolling 12 month total of final product storage VOC emissions (E_5) reaches 166 tons per year (80% of limit), the Permittee shall update final product storage VOC emissions on a weekly basis and shall record the amount of EPS that can be processed for the remainder of the month without exceeding the 207 tons per year rolling 12-month final product storage VOC emissions.

[County Rule 210 §301.1]

15) Emissions Calculations: [County Rule 210 §301.1]
By end of each calendar month, the Permittee shall perform the following emission calculations.

a) To monitor for compliance with the VOC emissions limits specified in these permit conditions, the Permittee shall calculate the rolling 12-month total VOC emissions from all processes; including EPS processing, solvent usage, boiler operation, and storage, by using the following procedures.

(1) Calculate monthly VOC emissions from EPS processing using the following equation:

$$E_1 = \frac{F_1 \times W}{2{,}000\ \text{lbs./ton}}$$

where,

E_1 = monthly VOC emissions from processing EPS beads [tons/month]. Processing starts from the time the EPS bead packaging is opened to the release of the container from the mold.

F_1 = Net VOC emission loss factor [lbs. VOC / lb. EPS processed] – The amount of VOC emitted, including controls, while processing EPS beads (i.e., starting from the time the EPS bead packaging is opened to the release of the container from the mold). The net VOC emission loss factor used in emissions calculations shall be 0.0198 lbs. VOC / lb. EPS processed until such time as the permit is reopened to incorporate the new VOC emission loss factor established through a source test.

W = weight of EPS beads processed during the reporting month [lbs/month].

The permit must be reopened after source testing conducted pursuant to condition 22.A is completed to develop a new factor for "F_1". The facility must submit a significant permit revision application within 90 days after submission of the test report to incorporate the new emission factor "F_1" into the permit. In addition, the permit revision application shall include proposed revisions to all permit conditions that relied on the old emission factor so that they will be based on the new emission factor. The new "F_1" factor will be determined by the following procedures:

$F_1 = \Delta P_1 * (1-R_1)$

ΔP_1 = Difference in Pentane Content between the raw EPS beads processed during the test run and the final product immediately after molding (expressed as lbs pentane/lb EPS). This factor will be determined through testing. This factor must be based upon the highest emitting product produced by WinCup unless every product is tested and an emission "ΔP_1" factor developed for each product. The emission factor, "F_1" shall be modified through permit revision.

R_1 = Overall VOC reduction efficiency of the emissions control system starting from the time the EPS bead packaging is opened to the release of the container from the mold. R_1 is determined through testing required in permit condition 22.B.2. The percent by weight value determined in testing is divided by one hundred (100) prior to use in this calculation.

(2) The Permittee shall monthly calculate and record the monthly VOC emissions from solvent use and printing (E_2). All VOCs in the solvents and inks are assumed to be emitted into the atmosphere unless off-site disposal records acceptable to the Control Officer are kept documenting the quantity and VOC content of VOC containing solvents and inks disposed of off site. The Permittee shall maintain Certified Product Data Sheets, manufacturer supplied data, or test data from on-site sampling documenting the VOC content of all

VOC containing solvents and inks. The Permittee shall calculate the VOC emissions based upon actual material usage records for each month.

[County Rule 210 §302.1c]

(3) The Permittee shall monthly calculate and record the monthly VOC emissions from boiler(s) natural gas combustion (E_3).

[County Rule 210 §302.1c]

(4) The rolling 12 month VOC emissions from bead processing, solvent usage, and boiler emissions shall be calculated as follows:

$$E_4 = \sum_{j=0}^{11} (E_{1(j)} + E_{2(j)} + E_{3(j)})$$

where,

E_1 = monthly VOC emissions from processing EPS beads [tons/month]. Processing starts from the time the EPS bead packaging is opened to the release of the container from the mold.

E_2 = monthly VOC emissions from solvent use and ink usage [tons/month].

E_3 = boiler natural gas combustion VOC emissions [tons/month]

j = a particular month within the 12-month reporting period, where j = 0 results in the calculation for the 12th month in the 12-month reporting period, and j = 11 results in the calculation for the first month in the 12-month reporting period.

[County Rule 210 §302.1c]

(5) The Permittee shall calculate the VOC emissions from final product storage by using the following equation:

$$E_5 = \frac{F_5 \times W}{2{,}000 \text{ lbs./ton}}$$

where,

E_5 = monthly final product storage VOC emissions (tons/month). Final product storage VOC emissions are VOC emissions that occur while the final product is being stored on-site prior to shipping to customer.

W = weight of EPS beads processed during the reporting month [lbs/month].

If the results of the initial source test, conducted pursuant to condition 22.B, show that emissions from post manufacturing are

greater than 0.0198 lbs pentane/lb EPS processed, the Permittee shall submit an application for a significant permit revision to the Director no later than 90 days after the submission of the test report to the Department, to revise equation E_5 to incorporate the new emissions factor for post-manufacturing product storage VOC

F_5 = Storage loss prior to final product shipment. Expressed in as pounds VOC per pounds EPS The net VOC emission loss factor used in emissions calculations shall be 0.0198 lbs. VOC / lb. EPS processed until such time as the permit is reopened to incorporate the new VOC emission loss factor established through a source test.

The permit must be reopened after source testing conducted pursuant to condition 22.A is completed to develop a new factor for "F_5". The facility must submit a significant permit revision application within 90 days after submission of the test report to incorporate the new emission factors and "F_5" into the permit. In addition, the permit revision application shall include proposed revisions to all permit conditions that relied on the old emission factor so that they will be based on the new emission factor. The new and "F_5" factors will be determined by the following procedures:

$F_5 = \Delta P_5 * (1-R_5)$

ΔP_5 = Difference in Pentane Content between final product immediately after molding and final product exiting the final product storage area for offsite distribution.

R_5 = Overall VOC reduction efficiency of the emissions control system for final product storage area if installed; or $R_2 = 0$.

W = weight of EPS beads processed during the month [lbs/month].

[County Rule 210 §302.1c]

(6) The rolling 12 month rolling VOC emissions from final product storage shall be calculated as follows:

$$\sum_{j=0}^{11} E_{5\,(12-j)}$$

E_5 = monthly final product storage VOC emissions (tons/month). Final product storage VOC emissions are VOC emissions that occur while the final product is being stored on-site prior to shipping to customer.
j= a particular month within the 12-month reporting period, where j = 0

results in the calculation for the 12th month in the 12-month reporting period, and j = 11 results in the calculation for the first month in the 12-month reporting period.

(7) The rolling 12-month total of "facility-wide" VOC emissions shall be calculated as follows:

$$E_6 = \sum_{j=0}^{11} E_{5(12-j)} + \sum_{j=0}^{11} E_{4(12-j)}$$

where, E_6 = 12-month rolling total of facility-wide VOC emissions from all processes, including final product storage for emissions inventory and fee purposes. [tons/12-month rolling period]

E_5 = monthly final product storage VOC emissions (tons/month). Final product storage VOC emissions are VOC emissions that occur while the final product is being stored on-site prior to shipping to customer.

E_4 = summation of monthly VOC emissions from bead processing, solvent and ink usage, and boiler combustion [tons/month].

j = a particular month within the 12-month reporting period, where j = 0 results in the calculation for the 12th month in the 12-month reporting period, and j = 11 results in the calculation for the first month in the 12-month reporting period.

16) VOC Control Device Recordkeeping Requirements: [County Rule 210§302.1]

a) Ductwork monitoring

1) On a monthly basis the Permittee shall conduct a visual inspection of the ductwork of the pentane recovery system to monitor for compliance with the requirement that no EPS beads can be loaded into the mixers or processed in the mixers or pre-expanders unless the exhaust from such equipment is ducted, in its entirety, to an incineration device (i.e., boilers). The Permittee shall maintain a record of each inspection, indicating the name of the person who conducted the inspection, the date and time the inspection occurred, an identification of any leaks or blockages in the ductwork of the pentane recovery system were discovered, corrective actions taken, a statement indicating the compliance status with respect the requirement specified above, and any corrective actions taken. The visual inspections shall look for visible, audible, or olfactory indications of leaks.

2) The Permittee shall install, operate, and maintain a pressure drop monitor on the beginning of the ductwork of the pentane recovery system and monitor and record, on a daily basis, the pressure drop to monitor for

compliance with the requirement to maintain the ductwork of the pentane recovery system under negative pressure.

b) The Permittee shall continuously monitor and record the operating temperature of each boiler while each boiler is operating. In addition, the Permittee shall make a permanent record of all other key system operating parameters of each boiler, as specified in the O&M Plan.

c) The Permittee shall provide, properly install and maintain in calibration and good working order and in operation, devices specified in the O&M Plan for indicating temperatures, pressures, rates of flow, or other operating conditions necessary to determine if air pollution control equipment is functioning properly and is properly maintained.

d) The Permittee shall install, operate, and maintain a volumetric flow rate monitor on each boiler that continuously indicates and records the volumetric flow rate of air to each boiler to monitor for compliance with the minimum volumetric flow rate requirement in this permit.

e) The Permittee shall make a permanent record in a maintenance log of the maintenance actions taken, within 24 hours of completion of the action, for each day or period in which the O&M Plan requires that maintenance be performed.

f) The Permittee shall enter an explanation into the maintenance log for scheduled maintenance that is not performed during the period designated for such maintenance in the O&M plan.

C. Gaseous and Odorous Air Contaminants [County Rule 210 §302.1.c]

The Permittee shall maintain a log of complaints of odors detected off-site. The log shall contain a description of the complaint, date and time that the complaint was received, and if given, name and/or phone number of the complainant. The logbook shall describe what actions were performed to investigate the complaint, the results of the investigation, and any corrective actions that were taken.

D. Solvent Cleaning

1) On a weekly basis, the Permittee shall inspect the solvent cleaning operations to monitor for compliance with the Operational Limitations and Standards for Solvent Cleaning pursuant to these permit conditions. The Permittee shall maintain a checklist for the weekly inspections, indicating the date the inspection occurred, the name of the inspector, the compliance status with respect to the applicable requirements in the Operational Limitations and Standards for Solvent Cleaning specified in these permit conditions, and any corrective action taken.

[County Rule 210 §302.1]

2) The Permittee shall maintain a current list of cleaning-solvents, stating the VOC-content of each in pounds of VOC per gallon of material or grams per liter of material.

[County Rule 331 §501]
[SIP Rule 331 §501]

3) The Permittee shall have on site the written value of the total VOC vapor-pressure of each cleaning solvent. The written value of the total VOC vapor pressure shall be in one of the following forms:

(a) A manufacturer's technical data sheet,
(b) A manufacturer's safety data sheet (MSDS), or
(c) Actual test results.

[County Rule 331 §501]
[SIP Rule 331 §501]

4) On a monthly basis, the Permittee shall record the amount of cleaning-solvent used during that month.

[County Rule 331 §501]
[SIP Rule 331 §501]

5) On an annual basis, the Permittee shall document the amount of concentrate that is used only in the formulation of Low VOC Cleaner.

[County Rule 331 §501]
[SIP Rule 331 §501]

E. Natural Gas Combustion – Boilers

The Permittee shall maintain records indicating the following information for each boiler:
1) type of fuel used;
2) amount of fuel used each month; and
3) the days and hours of operation

[County Rule 323 §501]

24. REPORTING REQUIREMENTS [County Rule 210 §302.1e]

**NOTE: Additional reporting requirements are found in the general conditions of this permit.*

The Permittee shall file semiannual monitoring reports with the Control Officer, Attn: Large Source Compliance Supervisor. The initial reporting period shall begin on the permit issuance date and shall cover a period of 6 months or less. The second and subsequent reporting periods shall be in 6-month intervals after the end of the initial reporting period. The semiannual monitoring reports shall be filed by the end of the month following the reporting period. Each report shall cover all instances of deviations from these permit conditions during the reporting period, the cause of the deviations if any were present, and any applicable corrective actions taken. If no deviations were observed, a statement to that effect will satisfy this requirement. The monitoring report shall also contain the following information at a minimum:

A. Visible Emissions

1) Dates on which visible emissions observations were taken;
2) Name of the observer;
3) Whether or not visible emissions were present;
4) The opacity of visual emissions determined by a Method 9 opacity reading, if applicable;
5) A description of any corrective actions taken, including the date such action was taken;
6) Name of individual certified as Method 9 opacity reader, which includes date of last certification, and company/agency providing the certification; and
7) Any other related information.

B. EPS Processing
1) The weight of EPS beads processed during each day, and the rolling 12-month total weight of EPS beads processed each month of the reporting period;
2) Based on inventory records, the Permittee shall maintain records of the average storage time for each type of cup/product manufactured at the facility. The box of finished product shall be labeled with the lot identification number, the date the box of finished product was processed, the date the box of finished product was stored in final product storage, and the date the lot is shipped offsite.
3) A statement indicating the compliance status with respect to the VOC emission limits (bead processing and final product storage emissions) required by this permit.
4) A statement indicating the compliance status with respect to the Maricopa County Rule 358§303.
5) A summary of any maintenance performed on the ECS.
6) Pentane content of beads processed.

C. Gaseous and Odorous Air Contaminants
The Permittee shall include a copy of the portion of the odor log, which covers the applicable 6-month reporting period in each of the semiannual compliance reports. If no complaints were received during the reporting period, a statement to that effect may be substituted for the copy of the odor log.

D. Solvent Cleaning
1) A current list of cleaning-solvents, stating the VOC vapor pressure of each in millimeters of mercury, and VOC-content of each in pounds VOC per gallon of material or grams per liter of material.

2) A summary of analyses that may have been performed to verify VOC content of solvents.

3) A summary of the amount of cleaning-solvent used during each month of the reporting period.

4) Rolling 12-month VOC emissions from solvent usage.

E. Boiler
1) Rolling 12-month particulate matter emissions from each boiler.
2) Rolling 12-month NO_x emissions from each boiler.

22. TESTING REQUIREMENTS

**NOTE: All test protocols, notifications and reports required by this permit condition should be addressed to the attention of the Air Quality Technical Services Unit Manager.*

A. The Permittee shall conduct a performance test on each boiler used for VOC abatement within 90 days after issuance of this permit and annually thereafter. Within 90 days of permit issuance, the Permittee shall conduct emission factor testing for each EPS bead type processed. Method 5 (or an alternate method approved in writing by the Department and the Administrator) shall be used for determining the outlet concentration of particulate matter (PM) from the boiler exhaust stacks during steady state operation. Test results using EPA Method 5 shall be based upon the arithmetic mean of the results of three test runs. Each test run shall have a minimum sample time of one hour.

B. Testing shall be conducted in order to:

1) Determine the VOC destruction efficiency of each Boiler

2) Determine the overall VOC reduction efficiency of the VOC abatement system starting from the time the EPS bead packaging is opened to the release of the cup or container from the molders "R_1(percent by weight)".

3) Determine the overall VOC reduction efficiency of the VOC abatement system for the final product storage area if R_2 is installed (percent by weight). Where R_2 = Overall VOC reduction efficiency of the emissions control system for final product storage area; if installed or R_2= 0

4) Determine the NOx and CO emissions rates (as both a mass rate and concentration) from the boiler.

5) Determine the percent pentane loss during each of the pre-expansion, aging, molding, screening, loading/mixing and final product storage processes to develop site-specific emission factors; "F_1" and "F_5". Emission factor(s) verification testing shall be conducted for each bead type processed.

[County Rule 200 §309]
[County Rule 270 §401]
[SIP Rule 27 §A]

6) Determine the sum of the VOC in lbs VOC/100 lbs of beads processed that escapes to atmosphere and the residual VOC lbs in VOC/100 lbs of beads processed in the resulting cups.

[County Rule 358 §303]

C. Testing Conditions:

1) Performance tests shall be conducted while operating the boilers in accordance with the O&M Plan.

2) All performance tests shall be conducted under such conditions as the Control Officer shall specify to the plant operator based on the worst case conditions, while running the highest emitting product or as an alternative, the Permittee may test each product individually and develop a separate emissions factors "F_1" and "F_5" for each product.

3) Performance test shall be conducted while routing all captured VOC emissions to the boiler that are routed during normal operation.

4) The Permittee shall make available to the Control Officer such records as may be necessary to determine the conditions of the performance tests.

5) Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions of performance tests.

[County Rule 270 §403]

[SIP Rule 27 §B]

D. Test Methods and Procedures: The Permittee shall use the following methods and procedures.

1) The Permittee shall conduct an annual performance test on each ECS each year between June 1 and August 31.

[County Rule 358 §503.1]

2) The Permittee shall perform the measurement of airflow and gas flow into and out of the ECS by performing EPA Method 2. The Permittee shall monitor and record the volumetric flow rate to the pentane recovery system at least once every 15 minutes during each of the three test runs. The Permittee shall monitor and record the minimum pressure drop at least once every 15 minutes during each of the three test runs.

[County Rule358 §503.2]

3) The Permittee shall determine the concentration of methane and ethane emissions by performing EPA Method 18 or Method 25 (and its sub-methods).

[County Rule 358 §503.3]

4) The Permittee shall determine the control efficiency of the VOC control device (abatement system) by performing EPA Method 25 (and its sub-methods).

[County Rule 358 §503.4]

5) The Permittee shall determine the efficiency of a capture system according to both EPA Method 204 (and it sub-methods) and EPA guidance documents.

[County Rule 358 §503.5]

6) The Permittee shall determine the concentration of total volatile organic carbon content in polymeric materials by performing Bay Area Quality Management District (BAAQMD) Method 45 or by performing South Coast Air Quality Management District (SCAQMD) Method 306-91, 1993, revision.

[County Rule 358 §503.6]

7) The Permittee shall determine the effectiveness of ECS from the results of a testing protocol based on mass balance, calculated according to the following formula:

$$\%\ CAPTURE = \frac{VOC_{ECS}}{VOC_I - VOC_P} \times 100$$

$$\%\ CONTROL = \frac{VOC_{ECS} - VOC_{St}}{VOC_{ECS}} \times 100$$

$$\%\ EMITTED = \frac{VOC_I + VOC_{St} - VOC_P - VOC_{ECS}}{VOC_I - VOC_P} \times 100$$

$$\%\ OVERALL\ (Capture + Control) = \frac{VOC_{ECS}}{VOC_I - VOC_P} \times \frac{VOC_{ECS} - VOC_{St}}{VOC_{ECS}} \times 100$$

Where:

VOC_I is the VOC input in the form of the VOC content of a weighed mass of raw beads.
VOC_P is the VOC content of the products made from the weighed raw beads.
VOC_{ECS} is the VOC measured in the air entering the ECS.
VOC_{Sf} is the VOC remaining in the gas stream(s) emerging from the ECS during production.

[County Rule 358 §503.7]

8) The Permittee of an EPS facility must demonstrate compliance with each alternative operating scenario.

[County Rule 358 §503.9]

9) Method 25 or an alternate method approved in writing by the Department and the Administrator shall be used for determining the inlet and outlet VOC concentrations of the Superior Aztec boilers and for determining VOC destruction efficiencies.

[County Rule 210 §302.1]

10) Method 7E (or an alternate method approved in writing by the Department and the Administrator) shall be used for determining the outlet concentration of NOx from the boiler exhaust stacks during steady state operation. NOx shall be measured dry and corrected to 3% oxygen. Test results using EPA Method 7E shall be based upon the arithmetic mean of the results of three test runs. Each test run shall have a minimum sample run time of one hour.

[County Rule 270 §402]
[County Rule 323 §304.1]
[SIP Rule 27 §B]

11) Method 10 (or an alternate method approved in writing by the Department and the Administrator) shall be used for determining the outlet concentration of carbon monoxide (CO) from the boiler exhaust stacks during steady state operation. Test results using EPA Method 10 shall be based upon the arithmetic mean of the results of three test runs. Each test run shall have a minimum sample time of one hour. CO shall be measured dry and corrected to 3% oxygen.

[County Rule 270 §402]
[SIP Rule 27 §B]

12) Method 5 (or an alternate method approved in writing by the Department and the Administrator) shall be used for determining the outlet concentration of particulate matter (PM) from the boiler exhaust stacks during steady state operation. Test results using EPA Method 5 shall be based upon the arithmetic mean of the results of three test runs. Each test run shall have a minimum sample time of one hour.

[County Rule 270 §402]
[SIP Rule 27 §B]

E. Test Protocol: The Permittee shall submit a test protocol to the Department for review and approval at least 30 days prior to the performance test. The test protocol must ensure that the pentane concentration at the inlet to the boiler does not exceed 25% of the lower explosive

limit for pentane (3750 ppmv). The test protocol must require that duplicate field samples be taken. Samples must be analyzed on the same day using the same instrument to avoid variability of the analytical device. Sample hold times must not exceed one week.

[County Rule 270 §301.1]
[County Rule 270 §403][SIP Rule 27 §B]

F. Notice of testing: The Permittee shall notify the Department in writing at least ten days prior to each performance test to allow Department representatives to be present during testing. The notice shall include the date and time that the testing is to be conducted.

[County Rule 270 §404]
[SIP Rule 27 §B]

G. Test Report: Within (30) days after completion of testing, the Permittee shall submit the final test report to the Department for review and approval. The final test report shall contain, at a minimum, the information required pursuant to the Arizona Testing Manual.

[County Rule 270 §301.1]
[SIP Rule 27 §B]

H. The test protocol, notification of testing, and the copy of all test results submitted to the Department shall be sent to the attention: Air Quality Technical Services Unit Manager.

[County Rule 200 §309]
[SIP Rule 27 §B]

23. COMPLIANCE PLAN

[County Rule 210 §305]

The Permittee is not in compliance with Maricopa County Rule 358 §§§401.3, 306, and 502.3. The Permittee and MCAQD entered into a settlement agreement on April 20, 2006. The agreement is attached in Appendix A .

The Permittee shall complete installation of all equipment required to meet the provisions of Maricopa County Rule 358 by September 25, 2006.

The compliance date of October 20, 2006 remains in effect, as stated in Maricopa County Rule 358.

24. COMPLIANCE SCHEDULE

In order to achieve compliance with Maricopa County 358, the Permittee shall meet the following requirements:

The Permittee must continue to operate in accordance with the settlement agreement entered into with MCAQD on April 20, 2006.

[County Rule 210 §305]

By October 20 2006, the Permittee must comply with the applicable standards in Sections 301, 302, 303, 304, and 305 of Maricopa County Rule 358.

[County Rule 358 §401.4]

The following compliance schedule shall apply:

[County Rule 210 §305]

Compliance Schedule

Milestone	Target Date	Completion Date
Continue to operate under the settlement agreement entered into with MCAQD on April 20, 2006.	September 25, 2006	September 25, 2006
By September 25, 2006, WinCup must complete installation of all equipment required to meet the provisions of Maricopa County Rule 358	September 25, 2006	September 25, 2006
By October 20, 2006, WinCup must comply with the applicable standards in Sections 301, 302, 303,304, and 305 of Maricopa County Rule 358	October 20, 2006	October 20, 2006
Submit Test Protocol for Emission Factor Testing to MCAQD	Within (60) days of permit issuance	Within (60) days of permit issuance
Notify MCAQD of Test Dates	(10) days prior to test date	(10) days prior to test date
Complete Emission Factor Testing	Within (120) days of permit issuance	Within (120) days of permit issuance
Submit Emission Factor Test Report to MCAQD	Within (30) days of test completion	Within (30) days of test completion
Submit Significant Revision Application to MCAQD to incorporate new emission factors into Title V permit	Within (90) days of submission of the test report to MCAQD	No later than January 20, 2006

APPENDIX A
SETTLEMENT AGREEMENT

Settlement
Agreement

APPENDIX B

LIST OF EQUIPMENT
WINCUP
V97012

PERMITTED EQUIPMENT:

Equipment Description	Quantity	Make / Type	Model	Installation Date	Rated Capacity
Mixer	2	Serial # 89037, 88044	SPC3648	1989/1991	1,000 lbs. EPS / hr
Pre-Expander	1	Rodman – 10 gal.	-	1999	≤ 1.37 lbs. EPS / hr
Pre-Expander	1	Hot Air	-	1994	180 lbs. EPS / hr
Pre-Expander	1	Rodman	-	1989	350 lbs. EPS / hr
Pre-Expander	1	Rodman	-	1989	350 lbs. EPS / hr
Pre-Expander	1	Rodman	-	1989	350 lbs. EPS / hr
Pre-Expander	1	Rodman	-	1989	350 lbs. EPS / hr
Pre-Expander	1	Rodman	-	1989	350 lbs. EPS / hr
Pre-Expander	1	Rodman	-	1989	350 lbs. EPS / hr
Pre-Expander	1	Rodman	-	1989	350 lbs. EPS / hr
Pre-expander	1	Rodman	-	1989	350 lbs. EPS / hr
Pre-Expander	1	TRI MFG	BU-902	1996	350 lbs. EPS / hr
Cup Molding Machines – 4 cavity	40	Mark 4	-	1989	4.48 – 23.25 lbs. EPS / hr
Cup Molding Machines – 6 cavity	38	Mark 6	-	1991	12.01 – 27.2 lbs. EPS / hr
Cup Molding Machines – 6 cavity	10	Mark 6	-	1996	12.01 – 27.2 lbs. EPS / hr
Cup Molding Machines – 10 cavity	4	Mark 10	-	2003	18.06 lbs. EPS / hr
Cup Molding Machine – 4 cavity	1	HK4	-	1996	4.48 – 23.25 lbs. EPS / hr
Cup Molding Machines - 6 cavity	2	HK6	-	1991	12.01 – 27.2 lbs. EPS / hr
Screener	10	-	-	1989	
Bead Aging Bags	10	Custom	-	1989	128 ft^3
Bead Line Bags	20	Custom	-	1989	6.25 ft^3
Fluidized Bed Dryer (R&D)	1	Custom	-	2002	100 lbs. EPS / hr
Boiler	2	Superior	Aztec Serial Nos. 10271 & 10668	1989, 1991	21.0 MMBTU / hr Input 16.7 MMBTU / hr Output

Equipment Description	Quantity	Make / Type	Model	Installation Date	Rated Capacity
Solvent Tank	1	Safety Kleen	11	Unknown	15 gallon
Printer Dry Offset / Emboss	6	KASE	4	Unknown	350 cups/minute 795 in^2 max. print area
Printer Dry Offset / Emboss	3	KASE	5A	Unknown	350 cups/minute 795 in^2 max. print area
Printer Dry Offset / Emboss	1	Van Dam	560	Unknown	400 cups/minute 795 in^2 max. print area
Printer Dry Offset / Emboss	1	WinCup Inline Printer (HK)	99	Unknown	200 cups/minute 52 in^2 max. print area

INSIGNIFICANT / TRIVIAL EQUIPMENT:

Equipment Description	Quantity	Make	Model	Installation Date	Rated Capacity
Fire System Engine (for Pump)	1	-	-	Unknown	3 gal. / hr. max. 50 gallons per year permitted